

Exhibit 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TOUCHPOINT PROJECTION
INNOVATIONS, LLC

Plaintiff,

v.

CDNETWORKS CO., LTD,

Defendant.

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Civil Action No. 2:23-cv-0233-JRG

DECLARATION OF WANTING WANG
IN SUPPORT OF DEFENDANT’S OPPOSED MOTION TO SET ASIDE
CLERK’S ENTRY OF DEFAULT AND QUASH SERVICE OF PROCESS

I, WanTing Wang, make the following declaration:

1. “I am Head of Legal Department at CDNetworks Co., Ltd. (hereinafter “Defendant”).

2. “Defendant is an organization existing under the laws of South Korea with its principal place of business in Seoul, South Korea. Its registered address is: 7F, 34, Mareunnae-ro, Jung-gu, Seoul, South Korea 04555.

3. “In March of 2023, before Touchpoint Projection Innovations, LLC, (hereinafter “Plaintiff”) initiated the above-stated civil action against Defendant, Plaintiff’s counsel and I exchanged written correspondence concerning Plaintiff’s allegation of patent infringement. In my written correspondence to Plaintiff’s counsel, I provided Plaintiff’s counsel with Defendant’s registered address in South Korea, specifically the registered address above. The Singapore address that Plaintiff alleges in its Original Complaint for Defendant is incorrect.

4. “The Singapore address provided in Plaintiff’s Original Complaint was a previous address to a sister company of Defendant. The Singapore sister company is neither a parent company nor a subsidiary company of Defendant.

5. “Defendant has not been properly served with process in the above-stated civil action pursuant to applicable laws, including the Hague Convention. Defendant did not willfully default in the above-stated civil action. Defendant believes that service of process must be legally and properly effectuated on it under applicable laws, including the Hague Convention, before it has to respond to the above-stated civil action. However, when Defendant became aware that a default had been entered against Defendant in the above-stated civil action, Defendant has intervened to request that the entry of default be set aside.

6. “In Plaintiff’s Original Complaint, Plaintiff supports its alleged infringement claims against Defendant with alleged factual allegations that it obtained from a particular website that Plaintiff attributes to Defendant. *See* Dkt. 1, at ¶¶63, 66-69. Specifically, Plaintiff alleges that Defendant has committed infringing acts and/or operates infringing systems and services based upon factual allegations set forth on a website having the domain name cdnetworks.com. *Id.* However, that domain name is not owned, registered or operated by Defendant.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 27, 2024.



WanTing Wang